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Subject: Acceptance review for EPID L-2019-LLA-0063 TSTF 545, Rev. 3 - Status accepted with administrative error
Date: Sunday, April 28, 2019 5:41:39 PM

Tom,

By letter dated March 22, 2019, Union Electric Company (the licensee), submitted a license amendment for Callaway Plant Unit 1 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19081A173).

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this license amendment. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required.

This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

The NRC staff also identify that a portion of TSTF 545, Rev. 3 as stated in ADAMS Accession No. ML15294A555 has administratively been misplaced in the licensee's initial LAR submittal above. Specifically, the text "SR 3.0.2 and SR 3.0.3 apply in Chapter 5 only when invoked by a Chapter 5 Specification.", page 85 of 361, utilizes this text in Section B 3.0, "Surveillance Requirement (SR) Applicability" in the subsection of Bases, SRs. However, in the licensee's submittal of March 22, 2019 this identified text, page 2 of Attachment 4, is placed within Section B 3.0, "Limiting Condition for Operation (LCO) Applicability," in the subsection of Bases, LCOs. The licensee is hereby requested to formally submit a supplemental letter to this LAR, on

the docket, at the next earliest convenience which will correct this item and amend any other pages as needed.

Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 125 hours to complete. The NRC staff expects to complete this review one year from the date of submittal, March 22, 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at the contact information below.

Thank you,

John Klos
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